

Steven J. Moser

Tel: 631-824-0200

steven.moser@moserlawfirm.com

MOSER LAW FIRM, PC



August 28, 2023

VIA ECF

Hon. Joan M. Azrack, USDJ
United States District Court, Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Moreno v. USA Tires Corp., et al.*, Case No. 23-cv-2266(JMA)(LGD)

Dear Judge Azrack:

I represent the defendants in the above referenced matter. Please accept this status report on behalf of all parties.

On June 23, 2023 the parties submitted a joint stipulation extending the deadline to respond to the complaint until July 27, 2023. At the time it was believed that this was sufficient time to explore pre-answer settlement negotiations. Plaintiff provided damages calculations to the undersigned today, August 28, 2023. In light of the fact that the Plaintiff claims to have been employed for less than 3 months, the parties believe that engaging in pre-answer settlement negotiations may be the best use of our resources and time.

Therefore, in order to continue to explore pre-answer settlement, the Defendants ask for a further extension of 30 days from today (September 28, 2023) to respond to the complaint. The Plaintiff has consented to this request.

Respectfully submitted,

Steven J. Moser

Steven J. Moser

CC: All counsel of record via ECF